



Your business
is our business.

REDACTED – FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 23, 2015

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2015 ETC Annual Report of South Central Communications
Study Area Code 351888**

Dear Ms. Dortch:

On behalf of South Central Communications (“Company”), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission’s rules.¹ Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC’s Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the initial section 54.202(a) of its Progress Report on its Five-Year Service Quality Improvement Plan and of outage reporting as required by Section 54.313(a)(1).³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

¹ 47 C.F.R. §§ 54.313, 54.422.

² Connect America Fund et al., WC Docket No. 10-90 et al., Protective Order, DA 15-712 rel. June 17, 2015 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).



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Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 14-58
2015 ETC Annual Report of South Central Communications
Study Area Code 351888
Request for Confidentiality

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client South Central Communications (the “Company”) hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,¹ withholding from public inspection certain information contained in attachments to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment are attachments to the Company’s annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).³
2. Pursuant to Section 54.313(a)(1), Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan (“Progress Report”)⁴ and must also report outages, both of which are contained in attachments to the 2015 Report.
3. The information contained in attachments for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s Five-Year Plan provided at FCC Form 481 Line 112 attachment. The Company also seeks withholding from public inspection data pertaining to the Company’s outages provided at FCC Form 481 Line 200 attachment, Service Outage Reporting. Information of this nature is confidential commercial information routinely withheld from public inspection.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ 47 C.F.R. §§ 54.313(a)(1).

4. With respect to identifying the degree to which the Five-Year Plan concerns a service that is subject to competition, the Line 112 attachment contains information of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment includes competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."⁵ Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

With respect to identifying the degree to which the outage data contained in the Line 200 attachment concerns a service that is subject to competition, the information pertains to the network and operations of a telecommunications company that has competitors that could benefit if they were able to have access to this information.

5. With respect to identifying possible exposure to competitive harm, the information contained in the subject attachments is information that is not customarily released to the public. The Five-Year Plan information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachments, the Company is filing

⁵ See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("March 5, 2013 Order") at para 9 citing Section 54.202(a) (1) (ii).

Request for Confidentiality

Page 3

the Five-Year Plan and outage attachments under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. The Commission has previously concluded that there is a presumptive likelihood of substantial competitive harm from disclosure of outage information.⁶ The Commission also determined the disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity and could therefore result in potential harm to the public and the national defense.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment, and to the Company's outage data provided at FCC Form 481 Line 200 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

⁶ See *In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, Report and Order and Further Notice of Proposed Rulemaking, FCC 04-188, rel. Aug. 19, 2004, para. 45.

<010> Study Area Code 351888

<015> Study Area Name SOUTH CENTRAL COMMUNICATIONS

<020> Program Year 2016

<030> Contact Name: Person USAC should contact with questions about this data Jenni Neff

<035> Contact Telephone Number: 6607482575 ext. Number of the person identified in data line <030>

<039> Contact Email Address: jneff@grm.net Email of the person identified in data line <030>

ANNUAL REPORTING FOR ALL CARRIERS	54.313 Completion Required	54.422 Completion Required
-----------------------------------	-------------------------------	-------------------------------

<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/> <input type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>
<210> <input type="checkbox"/> -- check box if no outages to report		<input checked="" type="checkbox"/> <input type="checkbox"/>
<300> Unfulfilled Service Requests (voice) <input type="text" value="0"/>		<input type="checkbox"/> <input checked="" type="checkbox"/>
<310> Detail on Attempts (voice) <input type="text"/>	(attach descriptive document)	<input type="checkbox"/> <input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband) <input type="text" value="0"/>		<input checked="" type="checkbox"/> <input type="checkbox"/>
<330> Detail on Attempts (broadband) <input type="text"/>	(attach descriptive document)	<input type="checkbox"/> <input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice) Fixed <input type="text" value="0.0"/> Mobile <input type="text" value="0.0"/>		<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband) Fixed <input type="text" value="0.0"/> Mobile <input type="text" value="0.0"/>		<input checked="" type="checkbox"/> <input type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance <input type="text" value="351888IA510.pdf"/>	(check to indicate certification)	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>
<510> <input type="text"/>	(attached descriptive document)	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations <input type="text" value="351888IA610.pdf"/>	(check to indicate certification)	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>
<610> <input type="text"/>	(attached descriptive document)	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/> <input type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/> <input type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/> <input type="checkbox"/>
<1000> Voice Services Rate Comparability Certification <input type="text" value="Yes"/>		<input checked="" type="checkbox"/> <input type="checkbox"/>
<1010> <input type="text"/>	(attach descriptive document)	<input type="checkbox"/> <input checked="" type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No) <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input type="checkbox"/> <input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/> <input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/> <input type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>

<2005>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>

<3005>

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	351888	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<015>	Study Area Name	SOUTH CENTRAL COMMUNICATIONS	
<020>	Program Year	2016	
<030>	Contact Name - Person USAC should contact regarding this data	Jenni Neff	
<035>	Contact Telephone Number - Number of person identified in data line <030>	667462575 ext .	
<039>	Contact Email Address - Email Address of person identified in data line <030>	jneff@grm.net	
<110>	Has your company received its ETC certification from the FCC?	(yes / no)	<input checked="" type="radio"/>
<110>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no)	<input type="radio"/>
<111>	year plan" filed with the FCC?	(yes / no)	<input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

351888IA112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- | | | |
|-------|--|----------------|
| <113> | Maps detailing progress towards meeting plan targets | Yes |
| <114> | Report how much universal service (USF) support was received | Yes |
| <115> | How much (USF) was used to improve service quality and how support was used to improve service quality | Yes |
| <116> | How much (USF) was used to improve service coverage and how support was used to improve service coverage | Yes |
| <117> | How much (USF) was used to improve service capacity and how support was used to improve service capacity | Yes |
| <118> | Provide an explanation of network improvement targets not met in the prior calendar year. | Not Applicable |

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(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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**(700) Price Offerings including Voice Rate Data
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<01>	Study Area Code	351888
<015>	Study Area Name	SOUTH CENTRAL COMMUNICATIONS
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jenni Neff
<035>	Contact Telephone Number - Number of person identified in data line <030>	6607482575 ext.
<036>	Contact Email Address - Email Address of person identified in data line <030>	jneff@grm.net

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**(710) Broadband Price Offerings
Data Collection Form**

FCC Form 481
OMB Control
14470

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**(900) Tribal Lands Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	351888
<015>	Study Area Name	SOUTH CENTRAL COMMUNICATIONS
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jenni Neff
<035>	Contact Telephone Number - Number of person identified in data line <030>	6607482575 ext .
<039>	Contact Email Address - Email Address of person identified in data line <030>	jneff@grn.net
<910> Tribal Land(s) on which ETC Serves		

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

Select Yes or No or Not Applicable	<input checked="" type="checkbox"/>	<input type="checkbox"/>					
--	-------------------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

(1100) No Terrestrial Backhaul Reporting
Data Collection FormFCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	351888
<015>	Study Area Name	SOUTH CENTRAL COMMUNICATIONS
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jenni Neff
<035>	Contact Telephone Number - Number of person identified in data line <030>	6607482375 ext. .
<039>	Contact Email Address - Email Address of person identified in data line <030>	jneff@grm.net

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).


<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).


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**(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form**

		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	351888
<015>	Study Area Name	SOUTH CENTRAL COMMUNICATIONS
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jenni Neff
<035>	Contact Telephone Number - Number of person identified in data line <030>	6607482575 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jneff@grm.net
		Name of Attached Document
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	
<1220>	Link to Public Website	HTTP http://www2.grm.net/phone/
<p>"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:</p>		
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

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(2000) Price Cap Carrier Additional Documentation	
Data Collection Form	
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers	

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	351888
<015>	Study Area Name	SOUTH CENTRAL COMMUNICATIONS
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jenni Neff
<035>	Contact Telephone Number - Number of person identified in data line <030>	6607422575 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jneff@grim.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1)}
- <2011a> 3rd Year Certification {47 CFR § 54.313(b)(1)ii}
- <2011b> Attachment {47 CFR § 54.313(b)(1)ii}

Name of Attached Document(s) Listing Required Information

Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}

- <2012> 2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}
- <2013> 2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}
- <2014> 2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}
- <2015> 2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

- <2016> Certification Support Used to Build Broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification

Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community/Anchor Institutions

Name of Attached Document(s) Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation
Data Collection Form

REDACTED FOR PUBLIC INSPECTION

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	351888
<015>	Study Area Name	SOUTH CENTRAL COMMUNICATIONS
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jenni Neff
<035>	Contact Telephone Number - Number of person identified in data line <030>	6607492575 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	infocfar.m.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010) Progress Report on 5 Year Plan Milestone Certification [47 CFR § 54.313(f)(1)(i)]	Name of Attached Document Listing Required Information <input type="checkbox"/>	351888TA3010.pdf
Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313(f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.		
(3012) Community Anchor Institutions [47 CFR § 54.313(f)(1)(ii)]	Name of Attached Document Listing Required Information <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	351888TA3012.pdf
Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:		
(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<input type="checkbox"/>	
(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
If the response is yes on line 3014, attach your company's RUS annual report and all required documentation		
(3018) If the response is no on line 3014, Is your company audited?	<input checked="" type="checkbox"/> <input type="checkbox"/>	
If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains		
(3019) Either a copy of their audited financial statement; or (2) a financial report, in a format comparable to RUS Operating Report for Telecommunications Borrowers,	<input checked="" type="checkbox"/> <input type="checkbox"/>	
(3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input checked="" type="checkbox"/> <input type="checkbox"/>	
Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit contains:		
(3021) If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2).	<input type="checkbox"/>	
Copy of their financial statement, which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,		
(3023) Underlying information subjected to a review by an independent certified public accountant	<input type="checkbox"/>	
(3024) Underlying information subjected to an officer certification.	<input type="checkbox"/>	
(3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
Underlying information listing required information		
(3026) Attach the worksheet listing required information		351888TA3026.pdf

(3000) Rate Of Return Carrier Additional Documentation (Continued)
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	351888
<015>	Study Area Name	SOUTH CENTRAL COMMUNICATIONS
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Jenni Neff
<035>	Contact Telephone Number - Number of person identified in data line <030>	6607482575 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	inseff@arm.net

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

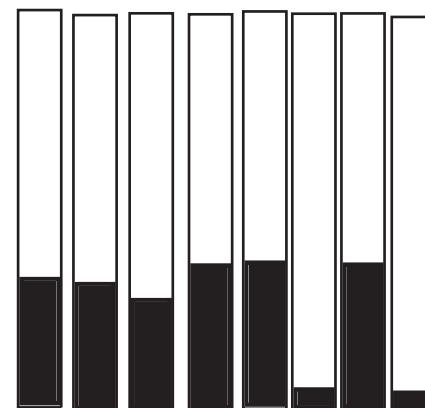
(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends



**Certification - Reporting Carrier
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	351888
<015> Study Area Name	SOUTH CENTRAL COMMUNICATIONS
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Jenni Neff
<035> Contact Telephone Number - Number of person identified in data line <030>	6607482575 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jneff@grm.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	351888
<015> Study Area Name	SOUTH CENTRAL COMMUNICATIONS
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Jenni Neff
<035> Contact Telephone Number - Number of person identified in data line <030>	6607482575 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jneff@grm.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier			
I certify that (Name of Agent) <u>Tanea Foglia</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.			
Name of Authorized Agent:	Tanea Foglia		
Name of Reporting Carrier:	SOUTH CENTRAL COMMUNICATIONS		
Signature of Authorized Officer:	CERTIFIED ONLINE	Date:	06/22/2015
Printed name of Authorized Officer:	Mark Yungeberg		
Title or position of Authorized Officer:	Vice-President		
Telephone number of Authorized Officer:	6607483231 ext.		
Study Area Code of Reporting Carrier:	351888	Filing Due Date for this form:	07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.			

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier			
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.			
Name of Reporting Carrier:	SOUTH CENTRAL COMMUNICATIONS		
Name of Authorized Agent or Employee of Agent:	Tanea Foglia		
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE	Date:	06/19/2015
Printed name of Authorized Agent or Employee of Agent:	Tanea Foglia		
Title or position of Authorized Agent or Employee of Agent	Manager - Regulatory Affairs		
Telephone number of Authorized Agent or Employee of Agent:	3014597590 ext.		
Study Area Code of Reporting Carrier:	351888	Filing Due Date for this form:	07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.			

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Attachments

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ATTACHMENT - LINE 112

**Five-Year Network Improvement Plan and
Progress Report**

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**South Central Communications, Inc. demonstration of complying with
applicable service quality standards and consumer protection rules for voice
and broadband services:**

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The Commission found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement and that the sufficiency of other commitments would be considered on a case-by-case basis. In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”³

- 1) South Central complies with the quality of service standard, service connection, held order and service interruption performance provisions of the state of Iowa, as promulgated in Iowa Administrative Code §199-22.6. South Central is committed to providing the highest quality service to its customers.
- 2) South Central complies with the requirements of 47 CFR Part 64 Subpart U, Customer Proprietary Network Information and Subpart Y, Truth in Billing Requirements for Common Carriers, and Federal Trade Commission Red Flag rules to prevent identity theft. A company manual for CPNI and Red Flags is in place, and employee training is conducted annually and new hires are instructed on the programs as required by their job functions.
- 3) The Company is subject to consumer protection obligations for broadband

¹ Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“2005 ETC Order”).

² Id. at para. 28.

³ Id. at n. 72.

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services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3.

- 4) The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order* when it becomes effective.

Grand River Mutual Telephone Corp Ability to Function in Emergency Situations for voice and broadband services:

South Central Communications, Inc. (“South Central”) hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)¹ and the Iowa Administrative Code § 199-22.6(5). Description of Functionality in Emergency Situations:

- 1) South Central has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.
- 2) Specifically, each of South Central's Community Dial Offices is equipped with a battery backup system capable of powering the equipment for a minimum of 8 hours with no outside power source. Each office also has a backup emergency generator (with a minimum of 35 kilowatts) capable of running for an extended number of days on liquid propane or diesel fuel. All digital loop carriers have battery backup also and are powered by portable generators during power outages. Where the company has deployed fiber to the home technology, the customer NID's have a UPS battery backup in case of emergency. South Central has built redundant facilities between its exchanges, affiliated companies and also back to its toll facilities which exit to the public switched telephone network. This redundant facility is in the form of SO NET or Asynchronous transport. The Company can change call routing translations as needed to reroute traffic around damaged

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”

facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require. South Central takes no responsibility for the capabilities of interconnected networks to manage traffic spikes resulting from emergency situations, but will continue its best efforts for its own network during such events.

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**(710) Broadband Price Offerings
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

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South Central Communications Inc. IA (SAC 351888)

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

South Central Communications Inc. IA (SAC 351888) hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

South Central Communications Inc. IA (SAC 351888)

**Response to Line 3012 - List of Community Anchor Institutions to Which the ETC Newly
Began Providing Service**

The FCC's *USF/ICC Transformation Order* requires a listing of community anchor institutions to which the ETC newly began providing broadband service. South Central Communications did not newly begin providing community anchor institutions with access to broadband service in calendar year 2014.¹ However, included is a revised master list of anchor institutions to correct data submitted last year.

¹ The FCC has defined community anchor institutions in Section 54.5 of its Rules as “schools, libraries, health care providers, community colleges, other institutions of higher education, and other community support organizations and entities.”

South Central Communications - Anchor Institutions

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FTTH exchanges - all anchor institutions have 10/1 available

Name of Anchor Institution	Telephone Number	Address	Voice	Fiber Broadband	15MG Broadband	Special Circuit
CORYDON - FTTH						
Wayne County Hospital	641-872-2260	417 S East St Corydon	x	x	x	
Heffron Chiropractic Clinic	641-872-2435	410 E Jefferson St Corydon	x	x	x	
Prairie Trails Family Dental Care	641-872-2514	100 E South St Corydon	x	x	x	
South Central IA Medical Clinic	641-872-2063	417 S East St Corydon	x	x	x	
Corydon Nursing & Rehab	641-872-1590	745 E South St Corydon	x	x	x	x
Clarke Eye Center	641-872-1842	212 N Franklin St Corydon	x	x	x	
New Venture Group Home	641-872-1524	100 E Monroe Corydon	x	x	x	
CHCSI Mental Health Center	641-872-1750	204 S Franklin St Corydon	x	x	x	
Lecompte Memorial Library	641-872-1621	108 S Franklin St Corydon	x	x	x	
Corydon City Hall	641-872-1826	101 W Jackson St Corydon	x	x	x	
Corydon Maintenance Shop	641-872-2128	511 W Maple St Corydon	x	x	x	
Corydon Fire Department	641-872-1826	205 S East St Corydon	x	x	x	
SIEDA Substance Abuse Services	641-872-2200	203 N Franklin St Corydon	x	x	x	
Milestone Area Agency on Aging	641-872-1433	511 E Marion St Corydon	x	x	x	
Wayne County Courthouse	641-872-2242	100 N Lafayette St Corydon	x	x	x	
Wayne County Home Health	641-872-2012	100 E South St Corydon	x	x	x	
Wayne Family Resource Center	641-872-3670	220 E Jefferson St Corydon	x	x	x	
Wayne County Sheriff's Office	641-872-1566	207 N Lafayette St Corydon	x	x	x	
Wayne County Yards	641-872-1912	703 Fairground Rd Corydon	x	x	x	
USDA	641-872-2670	300 S Lafayette St Corydon	x	x	x	
Corydon Housing Assn		511 E Jackson St Corydon	x	x	x	
Murphy Place	641-872-3993	620 E Monroe St Corydon	x	x	x	
Corydon Post Office	641-872-1952	215 W State St Corydon	x	x	x	
Wayne Community High School	641-872-3478	102 N Dekalb St Corydon	x	x	x	
Wayne Community Elementary	641-872-1034	607 S West St Corydon	x	x	x	
SIRF	641-872-1411	213 W Jefferson St Corydon	x	x	x	
Clerk of Court	641-872-2264	100 N Lafayette St Corydon	x	x	x	
Human Services	641-872-1820	100 N Lafayette St Corydon	x	x	x	

South Central Communications - Anchor Institutions
Confidential - Not for Public Inspection

FTTH exchanges - all anchor institutions have 10/1 available

Name of Anchor Institution	Telephone Number	Address	Voice
Wayne Co Attorney's Office	872-2054	107 W. Jackson Corydon, IA	x
SCI CAP	872-1282	220 E. Jefferson Corydon, IA	x x
Welcome We Help	872-3500	300 S. Franklin Corydon, IA	x x
Wayne Co Public Health	872-1167	100 E South Corydon, IA	x x
SCI CAP Head Start	872-2554	605 S. West Corydon, IA	x x
MURRAY - FTTH			
Murray Fire Department	641-447-3111	420 Maple St Murray	x
Murray City Hall	641-447-2522	420 Maple St Murray	x x
Murray Public Library	641-447-2711	416 Maple St Murray	x x
Murray Post Office	641-447-2666	430 Maple St Murray	x x
Murray Schools	641-447-2517	216 Sherman St Murray	x x
Murray Public Housing		710 5th St Murray	x x
LORIMOR - FTTH			
Lorimor City Hall	763-2297	503 Main St Lorimor	x
Lorimor Post Office	763-2119	512 Main St Lorimor	x x
Lorimor Public Housing		816 Main St Lorimor	x x
Lorimor Fire Department	763-2888	411 Minnesota Ave Lorimor	x x
Lorimor Community Center	763-2209	503 Main Street Lorimor, IA	x
Special Circuit			
15MG Broadband			
Fiber Broadband			

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ATTACHMENT - LINE 3017

ATTACHMENT REDACTED IN ENTIRETY